

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

STERLING D. BROWN,

Plaintiff,

v.

Case No. 18-CV-922

CITY OF MILWAUKEE,
CITY OF MILWAUKEE CHIEF OF
POLICE ALFONSO MORALES, in his
Official capacity,
SERGEANT SEAN A. MAHNKE,
SERGEANT JEFFREY S. KRUEGER,
OFFICER JOSEPH J. GRAMS,
OFFICER BOJAN SAMARDZIC,
OFFICER JAMES P. COLLINS,
OFFICER CRISTOBAL MARTINEZ AVILA,
OFFICER ERIK A. ANDRADE, and
OFFICER JASON P. JENSEN,

Defendants.

OFFER OF JUDGMENT PURSUANT TO FED. R. CIV. P. 68

To: Mr. Sterling D. Brown
c/o Atty. Mark Thomsen
Gingras Thomsen & Wachs SC
3228 Turnberry Oak Dr. – Ste. 210
Waukesha, WI 53188


Please take notice that the above named Defendants, offer to allow judgment against the City of Milwaukee in the amount of \$400,000, inclusive of all costs and attorney fees accrued through the date upon which this Offer was served, in satisfaction of all Plaintiff's claims against all of the named Defendants. Nothing in this Offer shall be construed as an admission of liability on behalf of any Defendant. To the contrary, this Offer is made in the interest of judicial

economy to the Court, the parties, and their attorneys. This offer is made pursuant to Fed. R.

Civ. P. 68(a).

Dated at Milwaukee, Wisconsin this 24th day of September, 2019.

GRANT F. LANGLEY
Milwaukee City Attorney



NAOMI E. GEHLING
Assistant City Attorney
State Bar No. 1061388
Attorneys for Defendants

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